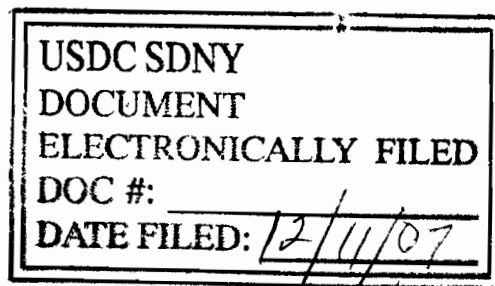


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-----X
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X

SOL CONTROL SRL
and subrogated cargo insurer;

Plaintiffs,

- against -

M/V "MSC REGINA", her engines, tackle,
boilers, etc. *in rem*;
WINDROSE LINE, a division of
ROHDE & LIESENFELD GMBH & CO.,
HAMBURG; ROHDE & LIESENFELD, INC.;
MEDITERRANEAN SHIPPING CO. S.A.;
MEDITERRANEAN SHIPPING CO. (USA)
INC.; MEDITERRANEAN SHIPPING CO.
SRL; MED ROMEO SA, *in personam*;;

Defendants.
-----X

07 Civ 9506 (SAS)
Related to 07 Civ. 9447

**PROPOSED
SCHEDULING ORDER**

WHEREAS, the Court issued an Order for Initial Pretrial Conference in accordance with Fed. R. Civ. P. 16(b) and said conference is to be held on December 10, 2007 at 4:30 p.m.; and

WHEREAS, the parties are required to jointly prepare and sign a proposed scheduling order containing certain information; and

NOW, THEREFORE, the parties hereby respectfully submit the following information:

(1) The appearances for the parties:

David Mazaroli for plaintiffs

Kennedy Lillis Schmidt & English (by Craig English)

for Rohde & Lisenfeld defendants

Lyons & Flood (by Edward P. Flood) for Mediterranean Shipping defendants

- (2) A concise statement of the issues as they now appear:

Are defendants jointly or severally liable for the loss of the shipment?

What is the quantum of recoverable damages?

Are defendants entitled to limited liability?

Are defendants entitled to cross-claim recovery?

What is the rate of prejudgment interest to be awarded, if any?

- (3) A schedule including:

- (a) the names of persons to be deposed and a schedule of planned depositions:

Representative of plaintiffs; representative of defendants; surveyors.

- (b) a schedule for the production of documents: January 15, 2008;

- (c) dates by which (i) each expert's reports will be supplied to the adverse side and (ii) each expert's deposition will be completed:

Experts' reports to be exchanged by March 11, 2008

Experts to be deposed by March 28, 2008

- (d) time when discovery is to be completed: April 4, 2008

- (e) the date by which plaintiffs will supply its pre-trial order matters to defendant: April 25, 2008

- (f) the date by which the parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either proposed findings of fact and conclusions of law for a non-jury trial.

May 16, 2008

- (g) Final pre-trial conference pursuant to Fed. R. Civ. P. 16(d):

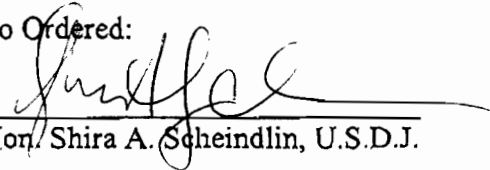
April 7 at 4:00

Feb +
March

- (4) A statement of any limitations to be placed on discovery, including any protective or confidentiality orders: None known at this time.
- (5) A statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement: None known at this time
- (6) Anticipated fields of expert testimony, if any:
Container handling practices and procedure; container and seal integrity issues; market value of the cargo.
- (7) Anticipated length of trial and whether to court or jury: 2-day non-jury.
- (8) This scheduling order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires.

Dated: New York, New York
December 10, 2007

So Ordered:


Hon. Shira A. Scheindlin, U.S.D.J.

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(USA) INC.
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